

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

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February 27, 2002

Joel Hebdon, Director
Office of Regulatory Compliance and Analysis
United States Department of Energy
P.O. Box 550, MSIN A5-58
Richland, Washington 99352



Dear Mr. Hebdon:

Re: NEW SOURCE REVIEW EXEMPTION FOR THE 276-S-141/142 HEXONE TANKS

Washington State Department of Ecology (Ecology) has reviewed the "New Source Review Exemption for the 273-S-141/142 Hexone Tanks," dated February 8, 2002 and received by us on February 12, 2002. The report is well done and thorough. Based on the information presented, only de minimis levels of air toxics are estimated to be emitted due to this process change. In addition, Department of Energy (DOE) and the contractor will maintain the Granulated Activated Carbon (GAC) Adsorption system in place until the tank is grouted. The GAC system is expected to be effective in limiting the amount of toxic air pollutants released during tank grouting to below estimated levels, or below levels that might currently exist in the headspace of the tanks.

The existing GAC system has apparently been effective in controlling emissions that would otherwise have been released untreated to the atmosphere. The absence in the exemption request of industrial hygiene monitoring data, or other related evidence, pointing to emissions from these tanks implies either the GAC is effective, or emissions are less than estimated and/or below odor threshold. Since the emissions are estimated to increase only about 16% due to tank filling, Ecology agrees this work constitutes only a minor process change in terms of potential emissions and should decrease potential future emissions by covering the waste.

DOE and the contractor shall continue to monitor the tanks during grouting and will respond appropriately to any unforeseen changes in tank emissions.

Mr. Joel Hebdon February 27, 2002 Page 2

Sincerely,

Stephen J Lijek, Environmental Engineer

Nuclear Waste Program

SJL:nc

cc:

James W. Golden, BHI Joan G. Woolard, BHI Rick Gay, CTUIR

Pat Sobotta, NPT Russell Jim, YN

Environmental Portal Administrative Record